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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**E.K. Blessing Co., Inc
1301 West Beardsley Ave.
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7254-00154	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 8, 2002 Expiration Date: May 8, 2007

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM) and Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a musical instrument manufacturing plant.

Responsible Official:	Mr. Randall Johnson, President
Source Address:	1301 Beardsley Avenue, Elkhart, Indiana, 46514
Mailing Address:	1301 Beardsley Avenue, Elkhart, Indiana, 46514
General Source Phone Number:	(219) 293-0833
SIC Code:	3931
County Location:	Elkhart
Source Location Status:	Maintenance for Ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) electrostatic air atomized spray coating booth, with a maximum capacity of 9.87 units per hour, using dry filters as overspray particulate matter control, constructed in 1996 and exhausting to stack #4; and
- (b) Eleven (11) buffing jacks and five (5) straps, with a total capacity of processing 32.42 pounds per hour of raw materials, using two (2) 16 oz. polypropylene fabric baghouses and one (1) napped cotton sateen fabric baghouse for particulate matter control and constructed in 1996.
- (c) One (1) Detrex vapor degreaser, constructed in 2000;
- (d) One (1) Baron Blakeslee vapor degreaser, constructed in 2000;
- (e) One (1) Atlantis Ultrasonic cleaning system, constructed in 2000; and
- (f) One (1) Ramco water immersion aqueous cleaning system, constructed in 2000.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including the following;

- (a) One (1) natural gas-fired boiler with a rated heat input of 0.5 million British thermal units (MMBtu) per hour, exhausting at one (1) stack; [326 IAC 6-2-4]
- (b) One (1) natural gas-fired boiler with a rated heat input of 0.117 MMBtu per hour, exhausting at one (1) stack; [326 IAC 6-2-4]

- (c) Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM and OAQ within a reasonable time, any information that IDEM and OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM and OAQ copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:
 - (A) A description of the emergency;
 - (B) Any steps taken to mitigate the emissions; and
 - (C) Corrective actions taken.The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
 - (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (d) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM and OAQ on or before the date it is due.

- (2) If IDEM and OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;

- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
 - (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 **Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 **Opacity [326 IAC 5-1]**
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2] [326 IAC 9-1-2]**
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **Operation of Equipment [326 IAC 2-7-6(6)]**
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment is (are) in operation.
- C.7 **Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
 - (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 22, 1996.
- (b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
- (1) Indicate estimated actual emissions of criteria pollutants from the source;
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) electrostatic air atomized spray coating booth, with a maximum capacity of 9.87 units per hour, using dry filters as overspray particulate matter control, constructed in 1996 and exhausting to stack #4;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-1(a)4]

Any change or modification which would increase the potential to emit VOC from the spray coating booth to fifteen (15) pounds per day or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirement of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations).

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the spray coating booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.5 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.1.6 Particulate Matter (PM)

In order to comply with D.1.2, the dry filters for PM control shall be in operation and control emissions from the spray coating booth at all times the spray coating booth is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray coating booth stack (stack #4) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirement

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each day;
 - (4) The total VOC usage for each day; and
 - (5) The weight of VOC emitted for each compliance period.
- (b) To document compliance with Conditions D.1.2 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) Eleven (11) buffing jacks and five (5) straps, with a total capacity of processing 32.42 pounds per hour of raw materials, using two (2) 16 oz. polypropylene fabric baghouses and one (1) napped cotton sateen fabric baghouse for particulate matter control and constructed in 1996.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the buffing operation shall be limited to 0.26 pounds per hour for a process weight rate of 32.42 pounds per hour by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (c) One (1) Detrex vapor degreaser, constructed in 2000;
- (d) One (1) Baron Blakeslee vapor degreaser, constructed in 2000.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

D.3.2 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T] [326 IAC 20-6-1]

Pursuant to 40 CFR 63, Subpart T, and 326 IAC 20-6-1, the two (2) degreasing operations (Detrex vapor degreaser and Baron Blakeslee vapor degreaser) are subject to the following conditions:

- (a) Pursuant to 40 CFR 63.463(a), the Permittee shall ensure that Detrex vapor degreaser and Baron Blakeslee vapor degreaser shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects;
- (b) Pursuant to 40 CFR 63.463(b), the Permittee shall comply with the following requirements for each of the batch vapor cleaning machines at the source:
 - (1) The Blakeslee vapor degreaser shall employ a control combination of freeboard refrigeration device, freeboard ratio of 1.0; or another equivalent method of control as determined using the procedure in 40 CFR 63.469;
 - (2) The Detrex vapor cleaning machine shall employ the following control combination of freeboard refrigeration device, freeboard ratio of 1.0, superheated vapor; or another equivalent method of control as determined using the procedure in 40 CFR 63.469.
- (c) Pursuant to 40 CFR 63.463(d), the Permittee shall meet all of the following required work and operational practices for each of the batch solvent cleaning machines:
 - (1) Control air disturbances across the cleaning machines opening by placing covers to each solvent cleaning machine during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
 - (2) The parts baskets or the parts being cleaned in the cleaning machines shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
 - (3) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
 - (4) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the Commissioner.
 - (5) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.

- (6) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
 - (7) During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - (8) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - (9) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 60 if requested during an inspection by the Commissioner.
 - (10) Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
 - (11) Sponges, fabric, wood, and paper products shall not be cleaned.
- (d) Pursuant to 40 CFR 63.463(e), the Permittee shall comply with the following requirements for each solvent cleaning machine.
- (1) Conduct monitoring of each control device used to comply with §63. 463 as provided in 40 CFR 63. 466, monitoring procedures.
 - (2) Determine during each monitoring period whether each control device used to comply with these standards meets the following requirements:
 - (A) The Permittee shall ensure that the chilled air blanket temperature (in EF), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point for the freeboard refrigeration device.
 - (B) When using a reduced room draft the Permittee shall:
 - (i) ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at anytime as measured using the procedures in 40 CFR 63.466(d).
 - (ii) establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in 40 CFR 63.466 (d).
 - (3) An exceedance has occurred if :
 - (A) the requirements of paragraphs (d)(2)(B)(ii) of this condition are not met; and
 - (B) the requirements of paragraphs (d)(2)(A) and (d)(2)(B)(i) of this condition have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameters must be remeasured immediately upon adjustment or repair and demonstrated to be within the required limits.
 - (4) the owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR 63.468.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations), for open top vapor degreasing operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing work loads through the degreaser;
- (c) Minimize solvent carryout by:
 - (1) racking parts to allow complete drainage;
 - (2) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);
 - (3) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) tipping out any pools of solvent on the cleaned parts before removal; and
 - (5) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;
- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-6]

- (a) Pursuant to 326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements) the owner or operator shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
 - (2) Equip the degreaser with the following switches:
 - (A) a condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm;

- (B) a spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches);
- (3) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-6(b);
- (4) Equip the degreaser with one (1) of the following control devices:
 - (A) a freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet);
 - (B) a refrigerated chiller;
 - (C) an enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser;
 - (D) a carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle;
 - (E) other systems of demonstrated equivalent or better control as those outlined in clauses (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision;
- (b) The owner or operator shall ensure that the following operating requirements are met:
 - (1) Keep the cover closed at all times except when processing workloads through the degreaser;
 - (2) Minimize solvent carryout emissions by:
 - (A) racking articles to allow complete drainage;
 - (B) moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);
 - (C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) tipping out any pools of solvent on the cleaned articles before removal; and
 - (E) allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
 - (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope;
 - (4) Prohibit occupation of more than one-half ($\frac{1}{2}$) of the degreaser's open top area with the workload;
 - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed;

- (6) Prohibit solvent spraying above the vapor level;
- (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately;
- (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate;
- (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements;
- (10) Prohibit the use of workplace fans near the degreaser opening;
- (11) Prohibit visually detectable water in the solvent exiting the water separator.

D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each degreaser (Detrex vapor degreaser and Blakeslee vapor degreaser) and each of the refrigeration jacket controlling VOC emissions.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Monitoring Procedures [326 IAC 2-7-6(1)]

That pursuant to 40 CFR 63.466 the Permittee shall comply with the following monitoring procedures:

- (a) The Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified in paragraphs below:
 - (1) The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket of the freeboard refrigeration device, during the idling mode.
 - (2) The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the superheated solvent vapor zone while the solvent cleaning machine is in the idling mode.
- (b) The Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified in paragraph below:
 - (1) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
- (c) The Permittee shall monitor the hoist speed as described below:
 - (1) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.
 - (2) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.

- (3) If the exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedance is demonstrated.
- (4) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record keeping Requirements [40 CFR Part 63, Subpart T] [326 IAC 20-6-1]

- (a) Pursuant to 40 CFR 63.467(a), the Permittee shall maintain, in written or electronic form, records of the following information specified below for the life time of the machine:
 - (1) Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment;
 - (2) The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted;
 - (3) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine subject to the provisions of Subpart T.
- (b) Pursuant to 40 CFR 63.467(b), for each batch solvent cleaning machine at the source complying with 40 CFR 63.463, the Permittee shall maintain records specified below either in electronic or written form for a period of 5 years.
 - (1) The results of control device monitoring required under 40 CFR 63.466.
 - (2) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (3) Estimates of annual solvent consumption for each solvent cleaning machine.

D.3.8 Reporting Requirements

A summary of the information to document compliance with Condition D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) An initial notification report for E.K. Blessings Co. Inc was submitted on July 15, 1999.
- (b) An initial statement of compliance for E.K. Blessings Co. Inc was submitted on July 15, 1999.
- (c) The Permittee shall submit an annual report by February 1 of the year following the one for which the reporting is being made for each batch solvent cleaning machine complying with the provisions of 40 CFR 63.463. This report shall include the requirements specified below:

- (1) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.463(d)(10)."
 - (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- (d) The Permittee shall submit an exceedance report to the commissioner semiannually except when, the commissioner determines, on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR 63.468 (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information as given below:
 - (1) Information on the actions taken to comply with 40 CFR 63.463(e). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - (3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- (e) Pursuant to 40 CFR 63.468(i), the Permittee that is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions specified below are met:
 - (1) The Permittee has demonstrated a full year of compliance without an exceedance.
 - (2) The Permittee continues to comply with all relevant record keeping and monitoring requirements specified in 40 CFR 63, Subpart A (General Provisions) and in 40 CFR 63, Subpart T.
 - (3) The Commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of 40 CFR 63, Subpart A (General Provisions).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Two (2) natural gas fired boilers with heat capacities of 1.17 and 0.546 MMBtu per hour, both constructed in 1996, and exhausting to stack # 1A and stack # 1B, respectively.

Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating): the particulate emissions from the two (2) boilers are each limited to 0.6 pounds per MMBtu.

D.4.2 Particulate Matter Limitation (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: E.K. Blessing Co., Inc.
Source Address: 1301 Beardsley Avenue, Elkhart, Indiana, 46514
Mailing Address: 1301 Beardsley Avenue, Elkhart, Indiana, 46514
Part 70 Permit No.: T 039-7254-00154

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: E.K. Blessing Co., Inc.
Source Address: 1301 Beardsley Avenue, Elkhart, Indiana, 46514
Mailing Address: 1301 Beardsley Avenue, Elkhart, Indiana, 46514
Part 70 Permit No.: T 039-7254-00154

This form consists of 2 pages

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- | |
|--|
| <p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">c The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); andc The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: E.K. Blessing Co., Inc.
Source Address: 1301 Beardsley Avenue, Elkhart, Indiana, 46514
Mailing Address: 1301 Beardsley Avenue, Elkhart, Indiana, 46514
Part 70 Permit No.: T 039-7254-00154

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Part 70 Permit

Source Name:	E.K. Blessings Company, Inc.
Source Location:	1301 West Beardsley Avenue, Elkhart, IN 46514
SIC Code:	3931
County:	Elkhart
Operation Permit No.:	T039-7254-00154
Permit Reviewer:	Alic Bent /EVP

On January 11, 2001, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Indiana, stating that E.K. Blessings Company, Inc had applied for a Part 70 permit for the operation of a musical instrument manufacturing plant. The notice also stated that OAQ proposed to issue a Part 70 Permit for this operation and provided information on how the public could review the proposed Part 70 Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Permit should be issued as proposed.

On January 29, 2002, Teri Schenk, Environmental Solutions, LLC submitted comments on the proposed Title V permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

On Page 5 of 40 in the permit Section A.2, you list one Atlantis Ultrasonic cleaning system constructed in 2000, this section should add one Ramco water immersion aqueous cleaning system constructed in 2000. The original permit application stated that there were two water cleaning systems. The permit as written suggests that there is only one system.

Response 1

The following changes have been made to Section A.2.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (d) One (1) Baron Blakeslee vapor degreaser, constructed in 2000; ~~and~~
- (e) One (1) Atlantis Ultrasonic cleaning system, constructed in 2000- ; ~~and~~
- (f) **One (1) Ramco water immersion aqueous cleaning system, constructed in 2000.**

Comment 2

The Reporting Requirements under Section D.3.8 were filed on July 15, 1999 by the Attorney representing EK Blessings in the Agreed Order.

Response 2

Condition D.3.8 (a) has been changed and (b) has been added to indicate that an initial notification report and an initial statement of compliance have been submitted and (c), (d) and (e) have been re-lettered.

D.3.8 Reporting Requirements

A summary of the information to document compliance with Condition D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

~~(a) Submit an initial notification report immediately. The report shall include the following information:~~

~~_____ (1) The name and address of the owner or operator.~~

~~_____ (2) The address of the solvent cleaning machine.~~

~~_____ (3) A brief description of each solvent cleaning machine including machine type, solvent/air interface area, and existing controls.~~

~~_____ (4) The date of installation for the solvent cleaning machine.~~

~~_____ (5) The anticipated compliance approach for the solvent cleaning machine.~~

~~_____ (6) An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.~~

(a) An initial notification report for E.K. Blessings Co. Inc was submitted on July 15, 1999.

(b) An initial statement of compliance for E.K. Blessings Co. Inc was submitted on July 15, 1999.

(bc) The Permittee shall submit an annual report by February 1 of the year following the one for which the reporting is being made for each batch solvent cleaning machine complying with the provisions of 40 CFR 63.463. This report shall include the requirements specified below:

(1) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.463(d)(10)."

(2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.

(~~e~~-d) The Permittee shall submit an exceedance report to the commissioner semiannually except when, the commissioner determines, on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR 63.468 (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information as given below:

- (1) Information on the actions taken to comply with 40 CFR 63.463(e). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
- (2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
- (3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

(~~de~~) Pursuant to 40 CFR 63.468(i), the Permittee that is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions specified below are met:

- (1) The Permittee has demonstrated a full year of compliance without an exceedance.
- (2) The Permittee continues to comply with all relevant record keeping and monitoring requirements specified in 40 CFR 63, Subpart A (General Provisions) and in 40 CFR 63, Subpart T.
- (3) The Commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of 40 CFR 63, Subpart A (General Provisions).

Upon further review, the OAQ has decided to make the following changes to the Part 70 Permit. Bolded language has been added and the language with a line through it has been deleted.

1. Condition A.1 General Information has been changed to add "Elkhart" to the source/mailling address as follows:

A.1 General Information ~~[326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]~~
The Permittee owns and operates a musical instrument manufacturing plant.

Responsible Official:	Mr. Randall Johnson, President
Source Address:	1301 Beardsley Avenue, Elkhart , Indiana, 46514
Mailing Address:	1301 Beardsley Avenue, Elkhart , Indiana, 46514

The Certification Form, Emergency Occurrence Report Form and Quarterly Deviation and Compliance Monitoring Report Form have also been changed to add "Elkhart" to the source/mailling address.

2. The compliance monitoring conditions for the eleven (11) buffing jacks and five straps on Page 13 of 14 of Technical Support Document were inconsistent with the permit. Compliance Monitoring is not required for this equipment. The Technical Support Document is not revised for this change. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

3. Condition B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

Addition of the new rule cite to B.2 Permit Term.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

4. Condition B.12 Emergency Provisions [326 IAC 2-7-16]

Condition B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation; ~~except as provided in 326 IAC 2-7-16.~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~
- (1) ——— If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) ——— ~~If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~
- (A) ——— ~~The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~
- (B) ——— ~~Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

5. Condition B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Condition B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with 40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

6. Condition B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

Condition B.14 Prior Permit Conditions Superseded was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,**
- (2) revised, or**
- (3) deleted**

by this permit.

(b) All previous registrations and permits are superseded by this permit.

7. Condition B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

Condition B.13 (b) Permit Shield has been removed. Since B.14 Prior Permits Superseded has been added to the permit, it is not necessary for this statement to be in this condition.

~~B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]~~

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

8. Condition C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

Condition D.1.7 Monitoring

Condition C.16 Compliance Response Plan - Failure to Take Response Steps (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or recordkeeping requirements may now be approved as minor permit modifications. The name of the condition has been changed to better reflect the contents of the condition.

C.16 Compliance Response Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.

- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray coating booth stack (stack #4) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

9. Condition D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Condition D.4.1 has been separated into two conditions.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

- ~~(a)~~ Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating): the particulate emissions from the two (2) boilers are each limited to 0.6 pounds per MMBtu.

D.4.2 Particulate Matter Limitation (PM) [326 IAC 6-3-2]

- ~~(b)~~ Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: E.K. Blessing Co., Inc.
Source Location: 1301 West Beardsley Avenue
County: Elkhart
SIC Code: 3931
Operation Permit No.: T039-7254-00154
Permit Reviewer: Alic Bent/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from E.K. Blessing Co., Inc. relating to the operation of a musical instrument manufacturer.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) electrostatic air atomized spray coating booth, with a maximum capacity of 9.87 units per hour, using dry filters as overspray particulate matter control, constructed in 1996 and exhausting to stack #4; and
- (b) Eleven (11) buffing jacks and five (5) straps, with a total capacity of processing 32.42 pounds per hour of raw materials, using two (2) 16 oz. polypropylene fabric baghouses and one (1) napped cotton sateen fabric baghouse for particulate matter control and constructed in 1996.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units which, pursuant to 326 IAC 2-7-10.5(f)(6), should have received a significant source modification:

- (a) One (1) Detrex vapor degreaser, constructed in 2000;
- (b) One (1) Baron Blakeslee vapor degreaser, constructed in 2000; and
- (c) One (1) Atlantis Ultrasonic cleaning system, constructed in 2000.

Each of the above units are insignificant activities because VOC and single HAP emissions are below 10 tons per year for each unit. However, the reason they are listed in the unpermitted activities section is because combined single HAP emissions are greater than 10 tons per year.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including the following;

- (1) One (1) natural gas fired boiler, with a maximum heat input capacity of 1.17 MMBtu per hour, constructed in 1996, and exhausting to stack # 1A; [326 IAC 6-2-4]
 - (2) One (1) natural gas fired boiler, with a maximum heat input capacity of 0.546 MMBtu per hour, constructed in 1996, and exhausting to stack # 1B; [326 IAC 6-2-4]
 - (3) One (1) natural gas fired air furnace, with a maximum heat input capacity of 0.0075 MMBtu per hour, constructed in 1996, and exhausting to stack # 1C;
 - (4) One (1) natural gas fired brazing unit, with a maximum capacity of 0.5 MMBtu per hour, constructed in 1996, and exhausting to stack # 5A; and
 - (5) One (1) natural gas fired pitch heating unit, with a maximum heat input capacity of 0.0096 MMBtu per hour, constructed in 1996, and exhausting to stack # 5B.
- (b) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons including the following:
- (1) One (1) 350 gallon trichloroethylene storage tank;
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (d) Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment; [326 IAC 6-3]
- (e) Solvent recycling systems with batch capacity less than or equal to 100 gallons; and
- (f) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) CP 039-4862-00154, issued on February 22, 1996.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on November 22, 1996. Additional information was received on September 6, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (5 pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	< 100
PM-10	< 100
SO ₂	< 100
VOC	< 100
CO	< 100
NO _x	< 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
MEK	less than 10
MIBK	less than 10
Glycol Ether	less than 10
Toluene	less than 10
Xylene	less than 10
Trichloroethylene	greater than 10
TOTAL	less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of trichloroethylene (a HAP) is greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.0168
PM-10	0.02106
SO ₂	0.0009
VOC	1.0357
CO	0.06
NO _x	0.141
HAP (specify)	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating	0.61	0.61	-	2.74	-	-	2.47
Degreaser	-	-	-	14.59	-	-	14.59
Buffing	1.14	1.14	-	-	-	-	-
Combustion	negl.	0.1	negl.	0.1	0.8	1.0	neg.
Total Emissions	1.75	1.85	negl.	17.43	0.8	1.0	17.06

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The one (1) natural gas fired boiler, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because it has a maximum heat input rate of less than 10 MMBtu/hr.
- (b) The one (1) Atlantis Ultrasonic cleaning system is not subject to the requirements of Subpart T because it does not use halogenated solvents and is not a vapor or cold solvent cleaning machine.
- (c) The Detrex vapor degreaser and the Baron Blakeslee vapor degreaser are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR 63.460 through 63.468, Subpart T) and 326 IAC 20-6-1 because each degreaser is a batch vapor cleaning machine using trichloroethylene as a cleaning agent.

Pursuant to 40 CFR 63, Subpart T, and 326 IAC 20-6-1, the two (2) degreasing operations are subject to the following conditions:

- (1) Pursuant to 40 CFR 63.463(a), the Permittee shall ensure that Detrex vapor degreaser and Baron Blakeslee vapor degreaser shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects;
- (2) Pursuant to 40 CFR 63.463(b), the Permittee shall comply with the following requirements for each of the batch vapor cleaning machines at the source:
 - (A) The Blakeslee vapor degreaser shall employ a control combination of freeboard refrigeration device, freeboard ratio of 1.0; or another equivalent method of control as determined using the procedure in 40 CFR 63.469;
 - (B) The Detrex vapor cleaning machine shall employ the following control combination of freeboard refrigeration device, reduced room draft, freeboard ratio of 1.0; or another equivalent method of control as determined using the procedure in 40 CFR 63.469.
- (3) Pursuant to 40 CFR 63.463(d), the Permittee shall meet all of the following required work and operational practices for each of the batch solvent cleaning machines:
 - (A) Control air disturbances across the cleaning machines opening by placing covers to each solvent cleaning machine during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.

- (B) The parts baskets or the parts being cleaned in the cleaning machines shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
 - (C) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
 - (D) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the Commissioner.
 - (E) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
 - (F) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
 - (G) During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - (H) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - (I) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 60 if requested during an inspection by the Commissioner.
 - (J) Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
 - (K) Sponges, fabric, wood, and paper products shall not be cleaned.
- (4) Pursuant to 40 CFR 63.463(e), the Permittee shall comply with the following requirements for each solvent cleaning machine.
- (A) Conduct monitoring of each control device used to comply with §63. 463 as provided in 40 CFR 63. 466, monitoring procedures.
 - (B) Determine during each monitoring period whether each control device used to comply with these standards meets the following requirements:
 - (i) The Permittee shall ensure that the chilled air blanket temperature (in EF), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point for the freeboard refrigeration device.
 - (ii) When using a reduced room draft the Permittee shall:

- (a) ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at anytime as measured using the procedures in 40 CFR 63.466(d).
 - (b) establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in 40 CFR 63.466 (d).
- (C) An exceedance has occurred if :
 - (i) the requirements of paragraphs (4)(B)(ii)(b) of this condition are not met; and
 - (ii) the requirements of paragraphs (4)(B)(i) and (4)(B)(ii)(a) of this condition have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameters must be re-measured immediately upon adjustment or repair and demonstrated to be within the required limits.
- (D) The owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR 63.468.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not a major source under 326 IAC 2-2 (PSD) because the potential to emit of any criteria pollutant is less than 250 tons per year, and it is not one of the twenty-eight (28) listed sources. Thus, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to this rule because all units were constructed after January 1, 1980 and it does not have potential VOC emissions of greater than 100 tons per year. Therefore, this rule does not apply.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The two (2) natural gas fired boilers, both constructed in 1996, with heat capacities of 1.17 and 0.546 MMBtu/hr, respectively, are subject to the particulate matter limitations of 326 IAC 6-2-4 for indirect heating facilities constructed after September 21, 1983 and shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{1.716^{0.26}} = 0.665 \text{ lb/mmBtu}$$

where: Q = total source rated capacity in mmBtu/hr

The allowable particulate emission rate from each of the two (2) boilers, based on the above equation, is 0.947 lb/mmBtu which exceeds allowable PM emission of 0.6 lb/mmBtu. Pursuant to 326 IAC 6-2-4(a) for Q less than 10 mmBtu/hr, the allowable PM emissions for the two (2) boilers is 0.6 lb/mmBtu. Each of the two (2) boilers emits a maximum of 0.01 pounds of PM per MMBtu heat input and is in compliance with 326 IAC 6-2-4.

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. The buffing operation listed in the permitted emission units and pollution control equipment section shall be subject to this limit.

(b) The particulate matter (PM) from the spray coating booth shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the spray coating booth is in operation, in order to comply with this limit.

(c) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. The welding operation listed in the insignificant activities section shall be subject to this limit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The VOC actual emissions from the spray coating booth shall be limited to less than 15 lbs/day, therefore the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) shall not apply.

326 IAC 8-3-2 (Cold Cleaner Operation)

The Atlantis Ultrasonic cleaning system and the Baron Blakeslee and Detrex vapor degreasers are not subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operation) because they are not cold solvent cleaning machines.

326 IAC 8-3-4 (Conveyorized degreaser operation) and 326 IAC 8-3-7 (Conveyorized degreaser operation and control)

The Atlantis Ultrasonic cleaning system is not subject to the requirements of 326 IAC 8-3-4 and 326 IAC 8-3-7 because it is not a conveyorized degreaser.

326 IAC 8-3-3 (Open Top Vapor Degreaser Operation)

- (a) The one (1) Atlantis Ultrasonic cleaning system is not subject to the requirements of 326 IAC 8-3-3 (Open Top Vapor Degreaser Operation) because it is not a vapor solvent cleaning machine.
- (b) The Baron Blakeslee and Detrex vapor degreasers are subject to the requirements of 326 IAC 8-3-3. Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreaser Operation), the owner or operator shall:
 - (1) Equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
 - (2) Keep the cover closed at all times except when processing work loads through the degreaser;
 - (3) Minimize solvent carryout by:
 - (A) racking parts to allow complete drainage;
 - (B) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);
 - (C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) tipping out any pools of solvent on the cleaned parts before removal; and
 - (E) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
 - (4) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
 - (5) Not occupy more than half of the degreaser's open top area with the workload;
 - (6) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
 - (7) Never spray above the vapor level;
 - (8) Repair solvent leaks immediately, or shut down the degreaser;
 - (9) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;

- (10) Not use workplace fans near the degreaser opening;
- (11) Not allow visually detectable water in the solvent exiting the water separator;
and
- (12) Provide a permanent, conspicuous label summarizing the operating requirements.

326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements)

- (a) Pursuant to 326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements) the owner or operator of the Baron Blakeslee and Detrex vapor degreasers shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
 - (2) Equip the degreaser with the following switches:
 - (A) a condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm;
 - (B) a spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches);
 - (3) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-6(b);
 - (4) Equip the degreaser with one (1) of the following control devices:
 - (A) a freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet);
 - (B) a refrigerated chiller;
 - (C) an enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser;
 - (D) a carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle;
 - (E) other systems of demonstrated equivalent or better control as those outlined in clauses (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision;
- (b) The owner or operator shall ensure that the following operating requirements are met:
 - (1) Keep the cover closed at all times except when processing workloads through the degreaser;
 - (2) Minimize solvent carryout emissions by:
 - (A) racking articles to allow complete drainage;

- (B) moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);
 - (C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) tipping out any pools of solvent on the cleaned articles before removal; and
 - (E) allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope;
 - (4) Prohibit occupation of more than one-half ($\frac{1}{2}$) of the degreaser's open top area with the workload;
 - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed;
 - (6) Prohibit solvent spraying above the vapor level;
 - (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately;
 - (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate;
 - (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements;
 - (10) Prohibit the use of workplace fans near the degreaser opening;
 - (11) Prohibit visually detectable water in the solvent exiting the water separator.

Testing Requirements

The Permittee is not required to test the two (2) degreasing operations (Detrex vapor degreaser and Blakeslee vapor degreaser) by this permit or by 40 CFR Part 63; 40 CFR 63.465 Test Methods. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. That pursuant to 40 CFR 63.466 the Permittee shall comply with the following monitoring procedures for the Detrex vapor degreaser and the Baron Blakeslee vapor degreaser:
 - (a) The Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified in paragraph(s) below:
 - (A) The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket of the freeboard refrigeration device, during the idling mode.
 - (B) The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the superheated solvent vapor zone while the solvent cleaning machine is in the idling mode.
 - (b) The Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified in paragraph below:
 - (A) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
 - (c) The Permittee shall monitor the hoist speed as described below:
 - (A) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.
 - (B) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.
 - (C) If the exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedance is demonstrated.
 - (D) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

These monitoring conditions are necessary to ensure compliance with 40 CFR 63, Subpart T and 326 IAC 2-7 (Part 70).

2. The baghouses controlling particulate matter emissions from the eleven (11) buffing jacks and five (5) straps have applicable compliance monitoring conditions as specified below:
 - (a) Once per shift visible emission notations of the eleven (11) buffing jacks and five (5) straps stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the buffing jacks and straps, at least once per shift when the buffing jacks and straps are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
 - (c) An inspection shall be performed each calendar quarter of all bags controlling the eleven (11) buffing jacks when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

These monitoring conditions are necessary because the baghouses for the buffing jacks and straps must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

3. The spray coating booth has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (stack # 4) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the spray coating booth must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this musical instrument manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-7254-00154**.

Appendix A: Emission Calculations

Company Name: E.K. Blessing Co., Inc.
Address City IN Zip: 1301 West Beardsley Ave.
Part 70 Permit No.: 039-7254
Plt ID: 039-00154
Reviewer: AB/EVP
Date: September 27, 2001

Total Potential To Emit (tons/year)				
Emissions Generating Activity				
Pollutant	Degreasing	Surface Coating	Combustion	TOTAL
PM	0.00	0.61	0.00	0.6
PM10	0.00	0.61	0.00	0.6
SO2	0.00	0.00	0.00	0.0
NOx	0.00	0.00	1.00	1.0
VOC	14.59	3.59	0.10	18.28
CO	0.00	0.00	0.80	0.80
total HAPs	14.59	2.47	0.00	17.06
worst case single HAP	14.59	0.97	0.00	
Total emissions based on rated capacities at 8,760 hours/year.				
**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration				
Total Limited Potential To Emit (tons/year)				
Emissions Generating Activity				
Pollutant	Degreasing	Surface Coating	Combustion	TOTAL
PM	0.00	0.61	0.00	0.61
PM10	0.00	0.61	0.10	0.71
SO2	0.00	0.00	0.00	0.0
NOx	0.00	0.00	1.00	1.0
VOC	14.59	< 2.74	0.10	17.33
CO	0.00	0.00	0.80	0.80
total HAPs	14.59	2.47	0.00	17.06
worst case single HAP	14.59	0.97	0.00	
Total emissions based on rated capacities at 8,760 hours/year.				
**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration				

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating and Degreasing Operations

Page 2 of 5 TSD App A

Company Name: E.K. Blessing Co., Inc.
Address City IN Zip: 1301 Beardsley Ave.
Part 70 Permit: 039-7254
Plt ID: 039-00154
Reviewer: Alic Bent/EVP
Date: September 27, 2001

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Lacquer, I 19191	7.5	85.40%	0.0%	85.4%	0.0%	9.30%	0.12800	6.41	6.41	0.82	19.68	3.59	0.61	68.87	0%
Detrex Vapor Degreaser	12.2	100.00%	0.0%	100.0%	0.0%	0.00%	0.16	12.20	12.20	1.95	46.85	8.55	0.00	N/A	100%
Baron Blakeslee Degreaser	12.2	100.00%	0.0%	100.0%	0.0%	0.00%	0.113	12.20	12.20	1.38	33.09	6.04	0.00	N/A	100%

Potential Emissions	Add worst case coating to all solvents	4.15	99.61	18.18	0.61
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METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Page 3 of 5 TSD AppA

Company Name: E.K. Blessing Co., Inc.
Address City IN Zip: 1301 West Beardsley Ave.
Part 70 Permit #: 039-7254
Plt ID: 039-00154
Permit Reviewer: Alic Bent
Date: September 27, 2001

Material	Density (Lb/Gal)	Gallons of Material (gal/hr)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % MEK	Weight % Glycol Ethers	Weight % Trichloroethylene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	MEK Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Trichloroethylene Emissions (ton/yr)
Lacquer, L19191	7.5	0.128	23.14%	14.65%	13.32%	2.58%	5.00%	0.00%	0.97	0.62	0.56	0.11	0.21	0.00
Detrex Vapor Degreaser	12.2	0.16	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00	0.00	0.00	0.00	0.00	8.55
Baron Blakeslee Degreaser	12.2	0.113	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00	0.00	0.00	0.00	0.00	6.04
									0.97	0.62	0.56	0.11	0.21	14.59

Total Emissions: **17.06**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MMBTU/HR <100

Company Name: E.K. Blessing Co., Inc.
Address City IN Zip: 1301 West Beardsley Ave.
Part 70 Permit #: 039-7254
Plt ID: 039-00154
Reviewer: AB/EVP
Date: September 27, 2001

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.2

19.6

a maximum
capacity of
0.0096 MMBtu/hr.

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	1.0	0.1	0.8

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions**

Page 5 of 5 TSD App A

Company Name: E.K. Blessing Co., Inc.
Address City IN Zip: 1301 West Beardsley Ave.
Part 70 Permit #: 039-7254
Plt ID: 039-00154
Reviewer: AB/EVP
Date: September 27, 2001

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.054E-05	1.174E-05	7.336E-04	1.761E-02	3.326E-05

1.840E-02

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.890E-06	1.076E-05	1.369E-05	3.717E-06	2.054E-05

5.360E-05

Methodology is the same as page 1.

1.846E-02

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.